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VIA CM-ECF

Honorable Douglas R. Arpert, U.S.M.J.
Clarkson S. Fisher Federal Bldg. & U.S. Courthouse
402 E. State Street
Trenton, NJ 08608

Re: Lawson, et al. v. Praxair, Inc., et al.
Civil Action No. 3:16-cv-02435-BRM-DEA

Judge Arpert,

We represent Defendant and Third-Party Plaintiff, Western/Scott Fetzer Company in the above captioned matter. We write in furtherance of the Praxair Defendants' August 30, 2016 letter, and in response to the September 4, 2016 letter from Plaintiffs' counsel, Mr. Sheridan. While we disagree with many of the contentions in Mr. Sheridan's letter relating to Plaintiffs' discovery requests, we do agree that resolution of the discovery issues between the parties would be most effectively resolved by a brief telephone conference with Your Honor.

We are available at Your Honor's convenience, should Your Honor require any additional information.

Very Truly Yours,

/s/Eric S. Westenberger

Eric S. Westenberger.

cc: All Counsel of Record (*via ECF*)

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